

Jamarlin Martin
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May 19, 2025

Hon. Lewis J. Liman
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Martin v. Zagorski, et al., Case No. 1:25-cv-02715-1

MOTION TO FILE UNDER SEAL

Dear Judge Liman:

I am the pro se plaintiff in the above-referenced matter. I respectfully request that this letter motion for extension of time be filed under seal pursuant to Your Honor's Individual Practices and the Southern District's Electronic Case Filing Rules & Instructions §6. The sensitive nature of the information contained herein, including references to potential surveillance, security concerns, financial disruptions, and medical information, warrants protection from public disclosure.

Pursuant to Federal Rule of Civil Procedure 6(b), I respectfully request an extension of time to file my response to defendants' motions to dismiss, from the current deadlines of May 26, 2025 (for all defendants except Kate Jhaveri) and May 27, 2025 (for defendant Kate Jhaveri), until Tuesday, July 1, 2025.

This request is based on a continuation of documented interference that predates this litigation. Since becoming an SEC whistleblower in February 2024 and throughout my prior legal proceedings against Outbrain Inc., I have experienced and formally documented a pattern of obstruction. I wish to bring to the Court's attention that these previously documented patterns appear to be continuing.

Recent incidents include:

1. Unexpected medical issues requiring emergency treatment, which have temporarily impacted my ability to prepare legal documents;
2. Evidence of potential unauthorized surveillance affecting my ability to conduct confidential legal work;
3. Technical malfunctions with home security systems that follow patterns previously documented;
4. Potentially strategically timed financial disruptions and events that appear designed to create resource constraints during critical litigation periods.

I have previously documented related incidents through formal reports filed well before this litigation commenced:

- Multiple Coconut Creek, Florida Police Department Reports filed between June 2024 and January 2025
- Federal Bureau of Investigation report submitted in June 2024. After the report, a new suspicious neighbor who had displayed intimidation and surveillance behavior for two months suddenly disappeared
- Multiple Securities and Exchange Commission whistleblower submissions beginning in February 2024

The long-standing nature of this documented pattern is relevant context for the Court's consideration of my extension request, as it demonstrates this is not a newly manufactured concern but a continuation of previously reported issues.

I note that defendants have retained F. Gregory Bowman of Williams & Connolly LLP, who specializes in national security matters, suggesting recognition of the broader implications of this case. This specialized representation further underscores the complexity of the legal issues involved and supports my request for additional time to properly prepare my response. I want to disclose to the court that I am not only a whistleblower to the Securities and Exchange Commission reporting securities fraud, I am also a United States national security whistleblower.

Each legal filing must be carefully considered as it could trigger retaliatory actions against the plaintiff or his family. This reality necessitates additional time for proper preparation of my response.

This is my first request for an extension in this matter. Due to the sensitive nature of the circumstances described above, I have not sought consent from opposing counsel for this extension and respectfully request the Court's guidance on this procedural matter.

I respectfully request that the Court maintain this filing under seal to protect the sensitive security, financial, and personal information contained herein.

Thank you for your consideration.

Respectfully submitted,

Jamarlin Martin

Pro Se Plaintiff

Plaintiff's request for an extension is GRANTED. Plaintiff's response to the motions to dismiss (Dkt. Nos. 14, 18) is due by July 1, 2025.

Plaintiff's requests to seal (Dkt. Nos. 22-23) are DENIED.

SO ORDERED.



LEWIS J. LIMAN
United States District Judge

May 28, 2025